

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Mahmoud KHALIL,

*Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

*Respondents.*

Case No. 25-cv-01935 (JMF)

**NOTICE OF MOTION FOR  
PRELIMINARY  
INJUNCTION**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and supporting declaration and exhibits, and previously filed briefing in this action, Petitioner Mahmoud Khalil, through counsel, hereby moves this Court for a preliminary injunction: (1) ordering the release of Mr. Khalil for the pendency of this litigation; (2) enjoining Respondent Rubio's determination that the INA's "Foreign Policy Ground" applies to him for the pendency of this litigation; and (3) enjoining Respondents from enforcing their Policy of arresting, detaining, and removing noncitizens who engage in constitutionally protected expressive activity in the United States in support of Palestinian rights or critical of Israel for the pendency of this litigation.

Dated: March 17, 2025  
New York, New York

Respectfully submitted,

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forthcoming*

NEW YORK CIVIL LIBERTIES UNION  
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